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May 20, 2020

HON. EDGARDO RAMOS United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

## MEMO ENDORSED

Re: USA v. Luis Parrales, et al.

1:19-cr-00663-ER

Your Honor:

My office represents the above-named defendant, Luis Parrales. United States Pretrial Services informs my office that they "reviewed the Order endorsed by the Court, but given that the order specifies that the employment will be up until May 17, 2020, we will need a new endorsed order that indicates that the defendant can stay overnight in PA for work-related purposes with prior PSA approval (not including any specific dates) so we no longer have the need to go back to the Court for modifications."

As such, my client requests this Court's permission to continue residing in Pennsylvania, at an address known to United States Pretrial Services, for legitimate work purposes. Moreover, U.S. Pretrial Services informs my office that "the defendant continues to provide employment verification & is in full compliance with the release conditions."

The Government officially takes no position as this application. We appreciate the Court's time in reviewing this letter.

Respectfully submitted,

Jonathan Rosenberg Attorney for Luis Parrales 137 Court Street, Fl. 2 Brooklyn, N.Y. 11201

Tel: (718) 715-4845

SO ORDERED.

Mr. Nicholas Chiuchiolo Assistant United States Attorney United States Attorney's Office Southern District of New York

cc:

Edgardo Ramos, U.S.D.J

Dated: <u>6/19/2020</u> New York, New York